

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

JENNIFER MAITRE, as Mother, Guardian and
Next Friend of CHRISTIAN FRANCIS
MAITRE, A Minor,

Plaintiff,

v.

ELI LILLY AND COMPANY,

Defendant.

Civil Action No. 05-CV-10442 (JLT/MBB)

JOINT MOTION FOR ORDER SEALING
CONSENT MOTION FOR SETTLEMENT APPROVAL

Plaintiff Jennifer Maitre, as mother, guardian, and next friend of Christian Maitre, and Defendant Eli Lilly and Company (“Lilly”), hereby jointly move for an Order sealing their Consent Motion for Settlement Approval. In support of their joint motion, the parties state as follows:

1. The parties appeared before Magistrate Judge Marianne B. Bowler on January 24, 2007 and agreed to a settlement of this case.
2. Pursuant to the Settlement Agreement entered into by the parties, the terms of the settlement are confidential and may not be disclosed. The confidentiality of this information is an integral component of the Settlement Agreement. Accordingly, these papers should not be placed in the public record in this case.

WHEREFORE, the parties respectfully request that this Court enter an Order sealing the their Consent Motion for Settlement Approval.

ELI LILLY AND COMPANY,
By Its Attorneys,

/s/ Brian L. Henniger (by permission)
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Respectfully submitted,

JENNIFER MAITRE, as mother, guardian
and next friend of CHRISTIAN MAITRE,
a Minor,

By Her Attorneys,

/s/ Erica Tennyson
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-and-

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DATED: March 15, 2007

CERTIFICATE OF SERVICE

I, Erica Tennyson, hereby certify that this Joint Motion for Order Sealing Consent Motion for Settlement Approval, filed through the ECG system, will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on March 15, 2006.

/s/ Erica Tennyson
Erica Tennyson

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**[PROPOSED] ORDER TO SEAL
CONSENT MOTION FOR SETTLEMENT APPROVAL**

Upon consideration of the parties' Joint Motion for Order Sealing Consent Motion for Settlement Approval, and for good cause shown, it is by this Court this _____ day of _____ 2007, hereby

ORDERED, that the parties' Joint Motion for Order Sealing Consent Motion for Settlement Approval be and the same hereby is, GRANTED, and it is further ORDERED, that plaintiff's Consent Motion for Settlement Approval be FILED UNDER SEAL.

Hon. Joseph L. Tauro
U.S. District Judge